

EM-151

STATE OF CALIFORNIA  
STATE AND CONSUMER SERVICES AGENCY  
CALIFORNIA BUILDING STANDARDS COMMISSION  
2525 NATOMAS PARK DR., SUITE 130  
SACRAMENTO, CA 95833  
(916) 263-0918 Phone  
(916) 263-0959 Fax  
Email: BSC@dgs.ca.gov

Office Use Item No. \_\_\_\_\_

**PARTICIPATION COMMENTS FOR THE NOTICE DATED OCTOBER 13, 2009**  
Written comments are to be sent to the above address.

**WRITTEN COMMENT DEADLINE: OCTOBER 27, 2009**

Date: October 16, 2009

From:

Becky Fraser

Name (Print or type)

Becky Fraser

(Signature)

Board of Director, California Building Officials

Agency jurisdiction, chapter, company, association, individual, etc

1225 Eight Street, suite 425, Sacramento, California 95014

Street

City

State

Zip

I/We (do)(do not) agree with:

☒ The Agency proposed modifications As Submitted on Section No. Chapter 16A Non Potable Water Reuse Systems

and request that this section or reference provision be recommended:

☐ Approved ☐ Disapproved ☐ Held for Further Study ☒ Approved as Amended

**Suggested Revisions to the Text of the Regulations:** Eliminate the exception for permit exemption as noted in section 1603A.1.1 and reiterated in 1601A.0(D), 1601A.1.1.9, 1603A.1.2.2, 1603A.1.3.2, Table 1603A.1.4 and 1604A.0.

**Reason:** CALBO encourages water preservation through the use of safe gray water systems. Local building departments have witnessed many unsafe gray water installations over the years. Local building departments have experienced that most homeowners do not know the typical requirements to safely install gray water piping. Improperly installed clothes washer drain, waste and vent systems are common violations observed by code officials. Unknowledgeable homeowners typically run the clothes washer line directly on top of the ground to water lawns and vegetable gardens. Omitting the exemption for clothes and/or one fixture will insure safe systems within our communities.

The provision of permit exemption while allowing a modification to an existing drain, waste and vent system could compromise the requirements of section 901.1 and 904.1 of the CBC. This would result in an improperly vented system or an open vent which is unsafe and potentially hazardous. Permits will insure the need for inspections that will control the correct application of Chapter 9 of the CBC. This will give the local enforcing agency the opportunity to amend or prohibit as needed in that jurisdiction.

Item #3 of Health and Safety Code 18930.